

EXHIBIT 33

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x

5 NATIONAL ASSOCIATION FOR THE
6 ADVANCEMENT OF COLORED PEOPLE,
7 SPRING VALLEY BRANCH; JULIO
8 CLERVEAUX; CHEVON DOS REIS; ERIC
9 GOODWIN; JOSE VITELIO GREGORIO;
10 DOROTHY MILLER; HILLARY MOREAU;
11 and WASHINGTON SANCHEZ,

12 Plaintiffs,

13 17 Civ. 8943

14 -against-

15 EAST RAMAPO CENTRAL SCHOOL
16 DISTRICT and MARYELLEN ELIA, IN HER
17 CAPACITY AS THE COMMISSIONER OF
18 EDUCATION OF THE STATE OF NEW
19 YORK,

20 Defendants.

21 - - - - -x

22 February 25, 2019
23 10:02 a.m.

24 Deposition of STEVEN WHITE,
25 taken by Defendant, pursuant to Notice,
held at the offices of Morgan Lewis
Bockius LLP, 101 Park Avenue, New York,
New York, before Sharon Pearce, a
Registered Merit Reporter, Certified
Realtime Reporter, and Notary Public of
the State of New York.

* * *

1 S. WHITE

2 S T E V E N W H I T E ,

3 having first been duly sworn by

4 Sharon Pearce, the Notary Public,

5 was examined and testified as

6 follows:

7 EXAMINATION

8 BY MS. KOLLM:

9 Q. Good morning, Mr. White.

10 A. Good morning.

11 Q. My name is Clara Kollm, and I
12 represent the East Ramapo Central School
13 District in this litigation.

14 Will you please state your full
15 name for the record.

16 A. Steven White.

17 Q. Do you understand that you're
18 here today pursuant to a subpoena?

19 A. Yes.

20 Q. Are you represented by counsel
21 today?

22 A. Yes.

23 Q. Is that your lawyer sitting next
24 to you?

25 A. Correct.

1 S. WHITE

2 seems to be the best term to describe the
3 division between the two sides. It
4 becomes complicated. You have some people
5 who are members of the Hasidic community
6 who send their kids to public school. So
7 it becomes complicated to find a good
8 term.

9 So for the most part, what you
10 have is people searching for a term that
11 seems to describe what you want to talk
12 about accurately. And it's never really
13 good. There's never -- I've never seen
14 anybody come up with a good accurate term
15 that describes that. I know that's a long
16 answer, but that's about the best I can do
17 to describe what that particular term
18 might mean there.

19 Q. So when you referred to the
20 private school community, you were
21 referring to Orthodox or Ultra-Orthodox
22 Jews in East Ramapo?

23 MS. BARBIERI: Objection.

24 A. That would be -- that would be
25 the majority of the people included in

1 S. WHITE

2 that -- in that particular term.

3 Q. Who else would be included?

4 A. Well, it's not that it would
5 include others. It's that if you said
6 it's the Hasidic community, you would be
7 saying there are members of the Hasidic
8 community who aren't part of the private
9 school community. So they're not -- the
10 two terms are not exactly equal. I would
11 say private school community would be a
12 subset of the Ultra-Orthodox or Hasidic
13 community, not the other way around.

14 Q. So can you give into an example
15 of who would be a member of the Hasidic
16 community who wouldn't also be a member of
17 the private school community?

18 A. We had a school board member.
19 His name was Stone. And he made a point
20 of pointing out that he was Orthodox and
21 he sent his kids to public school.

22 Q. Do you have a first name?

23 A. Is it Richard Stone? I think it
24 was Richard Stone.

25 Q. So let's go back to the

1 S. WHITE

2 Jewish landlords who are -- who have
3 become the absentee landlords in most of
4 Spring Valley. And so -- and so this is
5 what I'm referring to when I talk about
6 labor camp.

7 Q. So are you saying that the
8 Orthodox are trying to turn Rockland
9 County into a labor camp for the non-White
10 people who will work as domestic servants
11 for them?

12 A. No. I'm very clear that it's
13 Spring Valley.

14 Q. So are you saying that the
15 Orthodox community in Spring Valley is
16 trying to turn Rockland County into a
17 labor camp for the non-White people who
18 will work as domestic servants for them?

19 A. No. I'm not saying anyone is
20 trying to turn Rockland County into a
21 labor camp. I'm saying it's -- Spring
22 Valley is being used -- I mean, that's
23 pretty clear from what it says here.

24 Q. I'll try one more time.

25 So are you saying that the

1 S. WHITE

2 Orthodox community is trying to turn
3 Spring Valley into a labor camp for the
4 non-White people who will work as domestic
5 servants for them?

6 A. I'm saying it is currently being
7 used as a labor camp.

8 Q. Are you using "labor camp" for
9 the specific purpose of referring to the
10 Holocaust where Jews were actually put in
11 real labor camps?

12 A. No. The word "labor camp"
13 predates the Holocaust by a long time.

14 Q. Why did you use "labor camp"
15 here?

16 A. Labor camp is a place where
17 people live temporarily while they're
18 doing work. It's lodging. So when New
19 York State was settled, and the loggers
20 came to log New York State, they lived in
21 labor camps. That's where they slept.
22 That's where they ate. It's not a home.
23 It's a place where your workers are
24 lodged.

25 And so the essence of the

1 S. WHITE

2 for the other people living in the
3 neighborhood to cause them to want to get
4 out of that neighborhood.

5 Q. So when you're referring to
6 segregation in housing, you're referring
7 to the segregation we discussed earlier
8 with Orthodox Jews and other members of
9 the East Ramapo community; is that right?

10 MS. BARBIERI: You have to keep
11 your voice up. I can barely hear you.
12 You're mumbling.

13 MS. KOLLM: I will do my best.

14 MS. BARBIERI: You can talk
15 louder.

16 Q. Do you need me to repeat the
17 question, Mr. White?

18 A. Yes. Please repeat the
19 question.

20 Q. So when you were referring to
21 segregation in housing, your referring to
22 the segregation we discussed earlier with
23 the Orthodox Jews and other members of the
24 East Ramapo community; is that right?

25 A. So the -- what we discussed

1 S. WHITE

2 earlier included creating gated segregated
3 communities which are by one racial ethnic
4 group only. The group that happens to be
5 doing that in East Ramapo also happened to
6 be Orthodox Jewish for the most part.

7 Q. What do you mean when you say
8 "also happened to be"?

9 A. What I mean is that it doesn't
10 make a difference the religion of the
11 people who are doing these actions.
12 That's not the important part. The
13 important part is that people of other
14 ethnicities/races are not allowed into
15 these areas.

16 Q. Isn't their Orthodox religion
17 important to the people who are moving
18 into those communities?

19 MS. BARBIERI: I can't hear you.

20 Q. Isn't the religion important to
21 them?

22 MS. BARBIERI: Them? Meaning
23 who?

24 Q. Meaning the persons moving into
25 the segregated housing.

1 S. WHITE

2 conversation about the socioeconomic
3 relationships between different
4 communities in the area. This is
5 something that I feel I have some
6 awareness of. And I try to share it, and
7 sometimes I don't share it as eloquently
8 as I would like to. But this is a
9 document about racial social economic
10 justice for the Black, brown, Latino
11 people of color that live in my community
12 and how we can achieve a more balanced and
13 more fair and more socially just community
14 by addressing the fact that there are a
15 lot of inequities and there are power
16 differentials in the community.

17 Q. Are you finished?

18 A. Yes.

19 Q. Just for the record, Mr. White,
20 you're a White man; correct?

21 A. Correct.

22 Q. Okay. Let's take a quick break.

23 (Luncheon recess: 12:15 p.m.)
24
25

1 S. WHITE

2 Q. What is Power of Ten?

3 A. It's an email newsletter.

4 Q. And you manage the Power of Ten
5 email newsletter?

6 A. Correct.

7 Q. You're the only one who sends
8 out the newsletter; right?

9 A. Correct.

10 Q. When did you first create the
11 Power of Ten newsletter?

12 A. It was maybe 2009 or 2010.

13 Q. And you have always been the
14 only person who has sent out newsletter
15 for Power of Ten; is that right?

16 A. Correct.

17 Q. And you have a Power of Ten
18 email address; right?

19 A. Correct.

20 Q. Does any other person have a
21 Power of Ten email address?

22 A. No.

23 Q. Who creates the Power of Ten
24 content?

25 A. Mostly me.

1 S. WHITE

2 Q. Is it fair to say that you write
3 most of the content on Power of Ten
4 newsletter?

5 A. Yes.

6 Q. And there's also a Power of Ten
7 website; right?

8 A. Correct.

9 Q. Is it fair to say that you write
10 most of the content on the Power of Ten
11 website?

12 A. Yes.

13 Q. If content is written by someone
14 other than you, then you typically
15 attribute it to that person; is that
16 right?

17 A. Correct.

18 Q. And you approve all of the
19 content on the Power of Ten website;
20 right?

21 A. Yes.

22 Q. And you approve all content
23 on -- within the Power of Ten newsletter;
24 right?

25 A. Correct.

1 S. WHITE

2 Q. And any person can subscribe to
3 the Power of Ten newsletter; right?

4 A. Correct.

5 Q. How often does the Power of Ten
6 newsletter go out?

7 A. Maybe twice a month.

8 Q. Has that always been the case?

9 A. It varies with need. Sometimes
10 the month might go by with nothing, and
11 sometimes there might be three or four in
12 a month.

13 Q. How many persons subscribe to
14 the Power of Ten newsletter today?

15 A. I think I have about 6,000 email
16 addresses.

17 Q. Can you list for me the other
18 groups that you are involved with that are
19 involved in school board elections within
20 the district?

21 A. Currently, this year, you're
22 talking about?

23 Q. Sure.

24 A. I don't know of any other -- I
25 don't know of anyone who's actually

1 S. WHITE

2 involved in school board elections this
3 year.

4 Q. And by this year, you're
5 referring to the upcoming 2019 school
6 board election?

7 A. Correct.

8 Q. What about for the 2018 school
9 board election?

10 A. 2018 school board elections was
11 adopted by the group Strong East Ramapo.

12 Q. And what was your involvement
13 with Strong East Ramapo?

14 A. I'm the treasurer.

15 Q. Are you familiar with a group
16 called the East Ramapo Stakeholders
17 Republic Education?

18 A. Yes.

19 Q. Was that group active in school
20 board elections within the district?

21 A. Yes.

22 Q. When did that group begin
23 working -- when did East Ramapo
24 Stakeholders Republic Education, to your
25 knowledge, get involved in the district

1 S. WHITE

2 wanted to do the work.

3 Q. And what was that group called?

4 A. Concerned Citizens. I think
5 that's what they were called. Concerned
6 Citizens of East Ramapo, something like
7 that.

8 Q. Are you involved or were you
9 involved in 2011 or '12 with Concerned
10 Citizens of East Ramapo?

11 A. Yes.

12 Q. In what capacity?

13 A. I gave them technical support,
14 helped build the web page and things like
15 that.

16 Q. Do you know if the East Ramapo
17 Stakeholders group was formally
18 incorporated or otherwise registered with
19 the State of New York?

20 A. I believe it was not.

21 Q. So going back, what have your
22 various roles been related to the East
23 Ramapo Stakeholders when it was in
24 existence?

25 A. 2007, I was a regular assistant

1 S. WHITE

2 on the campaign, making some phone calls,
3 things like that. 2008, I was candidate.
4 2009, I was the -- what was the word they
5 used for it again? The chairman they
6 called me. The chairman of the East
7 Ramapo Stakeholders. And I was --
8 continued to be the chairman until it
9 dissolved in 2011 -- I think probably
10 2011. Yeah.

11 Q. And the East Ramapo Stakeholders
12 group is involved in slating candidates
13 for school board elections?

14 A. Yeah.

15 Q. In your opinion, what was your
16 greatest accomplishment as the chairman of
17 the East Ramapo Stakeholders?

18 A. I think I helped the group to
19 create a more democratic process and open
20 it up more to the whole general public as
21 a whole.

22 Q. A democratic process to slate
23 candidates for school board?

24 A. Right.

25 Q. And how did you do that?

1 S. WHITE

2 A. We held public forums, we
3 invited the public to come, and we invited
4 all eligible people who were interested in
5 running for school board to come and
6 participate.

7 Q. When was the first year that you
8 held a public forum for potential school
9 board candidates?

10 A. 2009.

11 Q. Where did that take place?

12 A. Oh, gosh. I think that might
13 have been at the Finkelstein Library.

14 Q. Do you remember approximately
15 how many people attended?

16 A. Maybe 50 or 60 people. It might
17 have been at the Rockland Community
18 College extension, now that I'm thinking
19 about it. It was either of those two
20 places, I believe.

21 Q. Okay. Did you have more than
22 one forum for potential candidates in
23 2009?

24 A. No.

25 Q. Did you continue to host forums

1 S. WHITE

2 made some flyers, but I can't really
3 remember.

4 Q. Would Power of Ten distribute
5 this information?

6 A. Yeah.

7 Q. Does Power of Ten endorse
8 candidates for school board?

9 A. Yes.

10 Q. In 2009, do you recall who the
11 candidates of Power of Ten endorsed?

12 A. There was -- it was Leonardo
13 Vera and Emilia White and Peggy Hatton.

14 Q. So going back for a second.
15 You said you ran for the school
16 board in 2008; is that right?

17 A. Correct.

18 Q. Did you receive any endorsements
19 for your candidacy?

20 A. No.

21 Q. Did you seek any endorsements
22 for your candidacy?

23 A. No. Well, it was -- it was a
24 strange year, because the president of the
25 school board, Nathan Rothschild, had

1 S. WHITE

2 ready. And then when it came time to hand
3 in the petitions -- because you still had
4 to go out and gather petitions -- we
5 handed in the petitions, and somebody else
6 handed in the petitions, and boom, I did
7 have an opponent. And so I never ended up
8 getting on the school board after all that
9 preparation.

10 Q. Do you recall who your opponent
11 was?

12 A. Aaron Weeder. Apparently, there
13 was some disagreement between
14 Mr. Rothschild and Mr. Weeder.
15 Mr. Rothschild was the one who had told us
16 there wouldn't be any opposition if we
17 only ran one person.

18 Q. So you were ultimately the one
19 public school candidate who ran for school
20 board in 2008?

21 A. Correct.

22 Q. Did you vote for yourself in
23 2008?

24 A. It's a long time ago. I hope I
25 did.

1 S. WHITE

2 candidacy for school board in 2008?

3 A. I think that people, when
4 they're considering who to vote for, think
5 about how is each candidate going to
6 represent the issues that are important to
7 my particular racial group.

8 Q. And your racial group was the
9 public school community?

10 A. No. That's not a racial group.

11 Q. What was your racial group?

12 A. Well, I'm White. But the
13 question is not my race. The question is
14 for a person who's a member of a racial
15 group who is going to vote, they're going
16 to ask themselves how will each candidate
17 who is running for office best represents
18 the issues that are important to me and my
19 racial group.

20 Q. Do you believe that you best
21 represented the interests of the minority
22 communities in the district in the 2008
23 election?

24 A. Yes, I did.

25 Q. Why do you believe that?

1 S. WHITE

2 the segregationist communities in New
3 Square and Monsey."

4 Do you see that?

5 A. Yes.

6 Q. What did you mean by "controlled
7 by the segregationist communities in New
8 Square and Monsey"?

9 A. Well, political and economic
10 life would refer to who gets elected to
11 office and who is in control of the means
12 of production in the community.

13 Q. Your campaign was not designed
14 to appeal to communities in New Square and
15 Monsey, was it?

16 MS. BARBIERI: Objection.

17 A. No.

18 Q. Did you ever deliver this
19 speech?

20 A. It was a long time ago. I don't
21 remember delivering the speech. But I see
22 that it's something that is written as a
23 speech. So most likely, I did.

24 Q. So can you read with me. I'm
25 going down to the fifth paragraph on the

1 S. WHITE

2 (S. White Exhibit 7, Official
3 School Board Election results dated
4 May 21, 2013, was marked for
5 identification, as of this date.)

6 Q. So Exhibit 7 is the official
7 results for the May 2013 school board
8 election.

9 Who were the public school
10 candidates in 2013?

11 A. We endorsed Margaret Tuck,
12 Eustache Clerveaux, and Robert Forrest.

13 Q. And when you say "we," you mean
14 the public school community?

15 A. That year -- because there have
16 been several different groups that have
17 come along that have wanted to be the ones
18 that, you know, were operating. I believe
19 that year was a group called Save Our
20 Schools. I believe Robert Forrest was the
21 president of Save Our Schools.

22 Q. So in 2013, the public school
23 candidates endorsed by Save Our Schools
24 were Margaret Tuck, Eustache Clerveaux,
25 and Robert Forrest; is that right?

1 S. WHITE

2 A. Yes.

3 Q. What race is Margaret Tuck?

4 A. She's African American.

5 Q. And what race is Robert Forrest?

6 A. African American.

7 Q. What about Bernard Charles?

8 A. African American.

9 Q. Pierre Germain?

10 A. African -- well, he's Haitian
11 descent, African American.

12 Q. Eustache Clerveaux?

13 A. Same.

14 Q. And Maraluz Corado.

15 A. She's Latina.

16 Q. How did you determine which
17 slate to endorse?

18 A. I think this was the year that
19 was the year after there were no
20 candidates. And there was going to be no
21 candidates that year also. No one had
22 come forward. No one had been wanting to
23 run a campaign. There was no action
24 whatsoever. And it was Robert Forrest who
25 came forth at the last minute really and

1 S. WHITE

2 tagged on to the end of the document when
3 I -- when I created a revised version in
4 2013 maybe. But whether or not I actually
5 distributed it or not, I don't remember.

6 (S. White Exhibit 9, An email
7 dated March 11, 2013, with attachment,
8 Bates PL0023470, was marked for
9 identification, as of this date.)

10 Q. So Exhibit 9 is an email from
11 Steve White to steve@poweroften.us dated
12 March 11, 2013.

13 Do you see that?

14 A. Yes.

15 Q. So I'd like to direct your
16 attention to Bullet 3, which starts at the
17 bottom of the first page and continues on
18 to the next page. So I'm going to read
19 that first paragraph.

20 "The Board of Education election
21 is fast approaching. There is a lot at
22 stake for the public school students. As
23 many of you know, there is a huge budget
24 deficit that threatens the very foundation
25 of education for every East Ramapo

1 S. WHITE

2 student. We need three candidates who are
3 thoroughly familiar with all issues facing
4 the district. The East Ramapo
5 Stakeholders for public education has
6 experience in assisting candidates in
7 forming a unified campaign and platform
8 based on community concerns as well as
9 providing voter information, coordinating
10 volunteers, and fundraising for school
11 board candidates. If you or someone you
12 know is considering running for the school
13 board, please have a look at the candidate
14 questionnaire at" -- and then there's a
15 hyperlink to the Power of Ten called
16 "Candidate Questionnaire."

17 Do you see that?

18 A. I see.

19 Q. It says, "Please send your
20 answers to steve@poweroften.us by Friday,
21 March 15th."

22 Do you see that?

23 A. I see.

24 Q. Does this refresh your
25 recollection about the procedure in 2013?

1 S. WHITE

2 want, which is what the goal of running a
3 questionnaire is."

4 So it may have been that Bob
5 Forrest became president of Save Our
6 Schools after he was the school board
7 candidate and not before. It may have
8 been -- the creation of Save Our Schools
9 may have come out of this particular 2013
10 campaign.

11 Q. So it was your idea in 2013 to
12 reach out to the public with a "call for
13 candidates"?

14 A. Yeah. I've always been the one
15 to remind people that you need to make the
16 process as democratic as possible. And I
17 constructed the questionnaires and the
18 forums and collecting all the data from
19 all the people who attended the forums and
20 in order to be able to provide the public
21 with some idea of -- that they are the
22 ones who are being consulted in all of
23 this. They are the ones who are being
24 represented.

25 Q. And is the questionnaire in

1 S. WHITE

2 2013 -- was it only available in English?

3 A. The questionnaire was only
4 available in English.

5 Q. Do you remember how many persons
6 filled out the 2013 candidate
7 questionnaire?

8 A. Oh, I don't remember.

9 Q. Do you remember if it was more
10 than five? Fewer than five?

11 A. I don't remember.

12 Q. Do you remember how you went
13 from calling for candidates in March of
14 2013 and then endorsing a public school
15 slate before the 2013 election?

16 A. Well, this is the way the
17 process is set up. And I remember that
18 being the year that we had a lot of
19 difficulties coming off of a year where we
20 had no campaign at all. But it's -- the
21 way it's supposed to be set up is you call
22 for people to throw their hat in the ring,
23 and then you gather from them their
24 responses to these questions, which are
25 actually -- the questions are all based on

1 S. WHITE

2 information from the Center For Public
3 Education web page to find out -- to get
4 some feedback from them about their
5 understanding of being a school board
6 member.

7 And then you share their
8 responses with the public when they come
9 to the forum, and then they are offered an
10 opportunity to present themselves to the
11 public. The public is offered an
12 opportunity to rate the candidates. And
13 after we collect those ratings, we bring
14 it back to the group of people who have
15 been candidates in previous elections.

16 So I hunt up all the people who
17 have previously ever been a candidate and
18 ask them to come together to a meeting and
19 sit down and review all of this to try to
20 put together the final slate of
21 candidates.

22 Q. And you've been organizing this
23 process since approximately 2009; is that
24 right?

25 A. Yes.

1 S. WHITE

2 Q. And that process is still going
3 on today?

4 A. Yes. And remember, I'm coming
5 out of my experience in 2008 when there
6 was a deal made and there was no
7 consultation of the public, and nobody
8 was -- people had a bad taste in their
9 mouth from having to make a deal with the
10 school board president about, "Well, you
11 guys pick a school board candidate and
12 we'll make a deal." And that left a very
13 bad taste in my mouth and in other
14 people's feelings that this is not the
15 correct way to go about representing
16 yourself as a representative of the
17 public, is to have smoke-filled backroom
18 deals.

19 And so I made sure that there
20 wasn't going to be any more smoke-filled
21 backroom deals, that we're always going to
22 reach out to the public, you know, and
23 more or less, we were successful, some
24 years better than others, mostly just due
25 to logistical challenges, lack of

1 S. WHITE

2 enthusiasm on the part of people.

3 Sometimes it would be hard to find anybody
4 who is -- really wanted to run for school
5 board.

6 But in most years, it seems that
7 we got a fairly good response of people
8 willing to run and a fairly good response
9 of people coming out to our forums or
10 sending emails or in other ways being
11 supportive and responsive to the more
12 democratic process that I was trying to
13 instill.

14 Q. Was the questionnaire
15 distributed to the public in any other way
16 other than the Power of Ten newsletter?

17 A. The announcement was made to the
18 local press. We sent out announcements
19 too. But it was not always passed on.
20 Sometimes -- there was sometimes when the
21 general news might publish something and
22 sometimes when they wouldn't have an
23 article about the --

24 Q. Were you finished?

25 A. Yes.

1 S. WHITE

2 Q. Do you have personal knowledge
3 that your candidate questionnaire was ever
4 published on any other medium besides
5 Power of Ten?

6 A. No. It wouldn't be -- it would
7 be a link. That's not how it works.

8 Q. I see.

9 A. Other people would pass on the
10 link to get to it. But it has to be in
11 one place, because you're collecting all
12 the information at one place. So --

13 Q. So the candidate questionnaire
14 is always on the Power of Ten website;
15 right?

16 A. Yes. Yes. The candidate
17 question -- the actual questionnaire
18 itself, the link to the questionnaire
19 could be passed around in many different
20 way, whether it's formally, informally.
21 But in order to access the questionnaire,
22 you would have to access the
23 questionnaire. It doesn't live in
24 multiple places on the internet. That's
25 not how the internet works.

1 S. WHITE

2 Q. Does anyone besides yourself
3 have access to the answers of potential
4 candidates before you circulate it?

5 A. No.

6 Q. So you just a moment ago said no
7 more deals.

8 What did you mean by that?

9 A. The year that I ran for school
10 board, there was a deal made between
11 Nathan Rothschild and Mimi Calhoun. And
12 people who had been activists in the
13 community were asked to abide by that deal
14 and to refrain from running for school
15 board in order so that Mr. Rothschild
16 would make sure that there would be no
17 opposition to our candidate.

18 Q. So to your knowledge, what was
19 the deal that ensured there would be no
20 opposition to your candidate?

21 A. If you run only one candidate,
22 that candidate will not be opposed.

23 Q. What's wrong with that deal?

24 A. It leaves out the -- it leaves
25 out the public. It's a smoke-filled

1 S. WHITE

2 (S. White Exhibit 11, Official
3 Election Results dated May 15, 2012,
4 Bates PL0070467, was marked for
5 identification, as of this date.)

6 Q. So Exhibit 11 is the official
7 school board results for 2012.

8 Does this refresh your
9 recollection as to whether there were
10 public school candidates running for the
11 school board in 2012?

12 A. Yes. Definitely.

13 Q. Who were the public school
14 candidates running for the school board in
15 2012?

16 A. It was Foskew, Rivera, and
17 Thompson. That was the Concerned Citizens
18 year, 2012.

19 Q. And Power of Ten endorsed
20 Foskew, Thompson, and Rivera?

21 A. Correct.

22 (S. White Exhibit 12, Official
23 Election Results dated May 20, 2014,
24 was marked for identification, as of
25 this date.)

1 S. WHITE

2 Q. So Exhibit 12 is the official
3 results from the May 2014 school board
4 election.

5 Do you see any public school
6 candidates who ran for office in 2014?

7 A. This is the year we didn't have
8 anybody.

9 Q. Okay. So why didn't you have
10 any public school candidates in 2014?

11 A. I think no one came forward.
12 There was no -- there was no interest.
13 That was the year of complete apathy. So
14 it wasn't 2013, which was after -- 2013
15 was before. 2015 was the year after. So
16 that's why I didn't remember -- that's why
17 2013 we did have a process, because 2013
18 we hadn't yet hit that point.

19 Q. Does this help you recall
20 anything about the process in 2013?

21 A. Yeah. 2013 would have been --
22 wouldn't have been the year that was --
23 that there was all of the confusion,
24 because that was the year that -- that was
25 the year before the year with no

1 S. WHITE

2 Q. Who was a member of Stakeholders
3 at that time?

4 A. There was a -- there was a good
5 group of people who were meeting. We had
6 Mimi, Steve Price, Suzanne Young Mercer,
7 Dr. Gordon, Professor Gordon, Jodi Fox,
8 Peggy Hatton, Tony Luciano. Who else used
9 to go? Carole Anderson. These are all
10 people who would regularly meet. There
11 were others too, but I'm not remembering
12 all of them.

13 Q. Okay. If you remember any
14 others, just let me know.

15 Were you still the chairman of
16 the Stakeholders?

17 A. I became chairman in 2009. And
18 I thought I had stopped using the name
19 after 2011. But apparently, I used it
20 once more in 2013. That must have been
21 the last time. But people had already
22 stopped meeting regularly by the time 2013
23 came around.

24

25

1 S. WHITE

2 Q. Did Power of Ten endorse any
3 candidates for school board in the 2014
4 election?

5 A. No.

6 Q. Why not?

7 A. No one coordinated themselves
8 together to present themselves to the
9 public.

10 MS. BARBIERI: Could we take a
11 quick break?

12 MS. KOLLM: Sounds good.

13 (Recess)

14 BY MS. KOLLM:

15 Q. So before the break, we were
16 just talking about the 2014 election.

17 Do you remember that?

18 A. Yeah.

19 Q. So I want to hand you what's
20 going to be marked as the next exhibit.

21 (S. White Exhibit 14, An email
22 chain dated January 4, 2015, Bates
23 SW-0000018885, was marked for
24 identification, as of this date.)

25 Q. So Exhibit 14 is an email from

1 S. WHITE

2 Q. So Exhibit 15 is the official
3 results from the May 2015 school board
4 election.

5 Who were the public school
6 candidates endorsed by Power of Ten?

7 A. Sabrina, Natashia, and myself.

8 Q. And it looks like there are two
9 three-way races, the seat of Jacob
10 Lefkowitz -- the candidates were Sabrina,
11 Jacob Lefkowitz, and Alan Keith Jones; is
12 that right?

13 A. That's correct.

14 Q. And for the seat of Mr. Solomon,
15 there are three individuals -- yourself,
16 Juan Pablo Ramirez, and Mr. Eisenbach; is
17 that right?

18 A. Correct.

19 Q. Why did Power of Ten endorse
20 Sabrina, yourself, and Ms. Morales over
21 any other candidate who ran in 2015?

22 A. In 2015 was that year when there
23 was so much disorganization. And there
24 was no candidate in 2014. And I believe
25 that Natashia really kind of just

1 S. WHITE

2 persuaded myself and Sabrina to get
3 involved. I don't remember the process
4 that we had. I do remember there being
5 forums. I remember attending some kind of
6 a forum where Mr. -- I believe Mr. Jones
7 attended.

8 Q. What race is Mr. Jones?

9 A. I believe he's African American.

10 Q. And what race is Mr. Ramirez?

11 A. He's Latino.

12 Q. So can you please turn back to
13 Exhibit 8. It is the email from you to
14 Ms. Morales dated February 23, 2015.

15 A. Okay. Yeah.

16 Q. So we've now established that in
17 the 2015 elections, you and Ms. Morales
18 ran as part of the same slate; is that
19 right?

20 A. Correct.

21 Q. So do you recall why you are
22 sending Ms. Morales the attachments and
23 the text within Exhibit 8?

24 A. It looks like it was just to
25 inform her of the history of campaigns and

1 S. WHITE

2 Q. And does the school board have a
3 role with regard to nonpublic school
4 students within the district?

5 A. There are some -- there are some
6 roles that the board has that pertain to
7 nonpublic schools. Yes.

8 Q. Did you take a position in your
9 2015 campaign on any of those roles?

10 A. I don't know. There had been an
11 ongoing problem with the school board
12 approving, spending public funds on
13 nonpublic education, for which they were
14 cited by the State Education Department
15 and eventually, after multiple lawsuits,
16 were forced to stop the practice. So we
17 might have had a position about spending
18 public funds illegally on nonpublic
19 education. That's possible.

20 Q. Did you campaign in any
21 neighborhoods where the parents primarily
22 sent their children to nonpublic schools?

23 A. We did not.

24 Q. Was it part of your platform in
25 2015 to oppose the plan of the Orthodox

1 S. WHITE

2 Jewish community to use Spring Valley as a
3 non-White labor camp?

4 A. I don't think that was part of
5 the school campaign. Excuse me.

6 Okay. Sorry about that.

7 MS. KOLLM: Just for the record,
8 Mr. White received a phone call and
9 silenced it.

10 Q. Thank you.

11 Did your 2015 platform attempt
12 to appeal to Orthodox voters within the
13 district in any way?

14 A. I believe there are some people
15 in the Ultra-Orthodox community who do
16 support public education. And if they --
17 if they approved what we were saying, then
18 that might be something that might appeal
19 to them.

20 Q. So I understand.

21 My question is not whether
22 persons in the Orthodox community
23 supported your platform. It's whether
24 there was anything within your platform
25 that was designed to elicit support from

1 S. WHITE

2 the Orthodox community.

3 A. Not specifically. There
4 wasn't -- it wasn't -- it wasn't
5 designed -- it wasn't designed
6 specifically to address any specific needs
7 that the Orthodox community would have
8 separate from the public school community.
9 But it wasn't excluding anyone from the
10 Orthodox community who would have had the
11 same feelings about the value of public
12 education that we had.

13 Q. Is that a typical stance for
14 public school candidates who run for
15 school board in the district?

16 MS. BARBIERI: Objection.

17 A. So I think that the platforms
18 have been about education and haven't been
19 about the school board -- when you're
20 running for a school board, you have to
21 run based on issues. And there are going
22 to be some people from every different
23 racial ethnic background who are going to
24 agree with your issues or disagree with
25 your issues.

1 S. WHITE

2 For the most part, the issues
3 that we were raising were issues which
4 were broadly supported by people of color
5 because they had their children in the
6 public schools, and they would benefit
7 from increased school funding and things
8 like that. And for the most part, it was
9 opposed by people who don't use the public
10 schools, because that wasn't a benefit
11 that they saw for themselves.

12 However, there would have been a
13 few people on each side who -- for whom
14 the appeal was not that way. I know that
15 there were some people in the Orthodox
16 communities, the Ultra-Orthodox Jewish
17 communities and the modern Orthodox Jewish
18 communities. We've got a variety of
19 Jewish communities in the district,
20 including people who are just ethnically
21 Jewish like myself, who have different
22 opinions about public education. So, you
23 know, even though it wasn't tailored or
24 designed to a person such as myself who is
25 ethnically Jewish versus someone who is my

1 S. WHITE

2 neighbor who might be a person who is not
3 Jewish but might agree with that.

4 So it wasn't really -- we didn't
5 tailor our campaign to focus specifically
6 for a particular ethnic or a religious or
7 racial group. But we did know that there
8 would be certain majorities from within
9 those groups who would support or oppose
10 the campaign based on the information that
11 we are giving.

12 Q. In your 2015 campaign for school
13 board, did you or your slate take a
14 position on taxes?

15 A. Well, the taxes for schools,
16 that's the school budget vote. And there
17 had been a number of years where we
18 purposefully did not take a position on
19 the school budget vote. And the reason
20 was because --

21 Q. Can I pause you just for a
22 second? Which years are you referring?

23 A. I would say -- I would say that
24 there was not a position like a yes or no.
25 When you saw the campaign literature that

1 S. WHITE

2 opinion was an inadequate budget.

3 Q. I know I interrupted you. Did
4 you have something else to say?

5 A. No. That's all.

6 Q. Okay.

7 (S. White Exhibit 16, Official
8 Election Results dated May 17, 2016,
9 was marked for identification, as of
10 this date.)

11 Q. So Exhibit 16 is the official
12 results of the school board election in
13 May 2016.

14 Who were the public school
15 candidates endorsed by Power of Ten in the
16 2016 election?

17 A. It would be Foskew and Fields
18 and Natasha Morales and Sabrina.

19 Q. And can you tell me the race of
20 each candidate?

21 A. Foskew is White. Fields is
22 African American. Natasha is Latina.
23 Sabrina is African American of Haitian
24 descent.

25 Q. And can you tell me the races of

1 S. WHITE

2 each of their opponents?

3 A. Charles is African American.
4 Pierre Germain is African American of
5 Haitian descent. Weissmandl is White.
6 That's all.

7 Q. Thank you.

8 (S. White Exhibit 17, An email
9 dated December 18, 2015, with a
10 questionnaire, Bates EW-0000019847,
11 was marked for identification, as of
12 this date.)

13 Q. So Exhibit 17 is an email from
14 Steve White dated December 18, 2015, to
15 several people. The subject line is
16 "2016candidatequestionnaire.docx." And if
17 you look on the back, the page with Bates
18 No. EW0000019848, you'll see a document
19 titled "The 2016 East Ramapo School Board
20 Candidate Questionnaire."

21 Do you see that?

22 A. I see it.

23 Q. Did you write the 2016 East
24 Ramapo School Board Candidate
25 Questionnaire?

1 S. WHITE

2 A. Yes. Well, I should say a
3 certain amount of this is still being
4 plagiarized from -- well, it's not
5 plagiarized. I gave credit to the Center
6 For Public Education.

7 Q. You compiled the document titled
8 "2016 East Ramapo School Board Candidate
9 Questionnaire"?

10 A. Yes.

11 Q. Okay. And I'm going back to the
12 first email on the page ending in 19847.
13 And you say, "Dear former candidates for
14 school board, some of you came on Monday
15 to discuss the 2016 campaign. We agreed
16 to hold a public forum in January on
17 either Wednesday, the 20th, or Saturday,
18 the 23rd. Work to be done is write a
19 press release, post a questionnaire for
20 potential candidates, update the web page
21 and Facebook page to reflect our
22 activities." And then there are links to
23 Facebook and a web page for
24 Charles-Pierre, Morales, White. And then
25 it says "Questionnaire attached."

1 S. WHITE

2 Do you see that?

3 A. I see.

4 Q. So why did you send out this
5 email to the former candidates for the
6 school board?

7 A. Asking for help with the work
8 that needs to be done.

9 Q. Had anyone started the 2016
10 campaign for school board prior to you
11 sending this email on December 18, 2015?

12 A. I don't know if anyone had done
13 anything. From looking at this, I see
14 this looks like it's -- we had already met
15 on Monday. So probably -- this was
16 December 18th. So probably sometime
17 during the month of December, somebody
18 said, "Hey, we need to do something." And
19 I had to invite people to something that
20 had happened on Monday to discuss how are
21 we going to do this. And part of the
22 process of what happened on Monday was we
23 tried to pick a date for a forum. And we
24 had a couple of tentative dates that we
25 had worked out for the forum.

1 S. WHITE

2 Q. Is this forum a public forum or
3 is it a forum to discuss potential
4 candidates for the public school slate?

5 A. No. The public forum.

6 Q. And at the public forum in early
7 January -- or late January -- excuse me --
8 potential school board candidates would
9 announce their candidacy or something
10 else?

11 A. Yes. They would present
12 themselves to the public. The public
13 would be handed copies of the
14 questionnaires that were filled out with a
15 rating system for them to review the
16 candidates. And then I would collect that
17 information and bring it back to the list
18 of people who you see on the top of this
19 email most likely, all former candidates.

20 Q. Why wasn't Alan Jones included
21 as a former candidate?

22 A. These are the former candidates
23 who have all been previously parts of our
24 campaigns. So I wouldn't include former
25 candidates of people who had not worked

1 S. WHITE

2 with us.

3 Q. And by "us," you're referring to
4 the public school community; is that
5 right?

6 A. No. I mean, it's the group of
7 people who have all been working together
8 on campaigns. If I worked together with
9 Sabrina and Robert Forrest, I don't
10 remember which year that Mr. Jones ran,
11 but, you know, we all -- part of the deal
12 is if you want to be -- if you want to
13 receive endorsements, if you want to
14 participate with others, part of the deal
15 is that you agree to the process and to
16 participate with the process. If you show
17 up and say, "I'm going to run
18 independently of whatever anybody else
19 wants to do," you're perfectly welcome to
20 run independently of what everybody else
21 wants to, but you're not part of the joint
22 process that everyone else is working on
23 together.

24 Q. So Mr. Jones in 2015 ran
25 independently and was not part of the

1 S. WHITE

2 slating process for which you were
3 involved; is that right?

4 A. I don't think that he ever
5 submitted -- I can't say I know for sure
6 if he ever submitted a questionnaire or
7 if -- I think he just basically
8 pronounced, you know, I'm going to be a
9 candidate. And it was -- to be honest,
10 Mr. Jones' campaign was a little bit of a
11 oddball. He did attend a forum. I
12 remember him attending a forum, and he and
13 I were both discussing the issues. And
14 every question that came up, I would give
15 an answer, and he would say, "Well, I
16 agree with everything Mr. White says."
17 And I was, like, "Well, why are you
18 running against if you're just going to
19 agree? Why don't you just work with us?"
20 It was, you know, crazy.

21 But that's how -- that's how he
22 was. He was a little bit of a strange
23 person. And, you know, he was welcome to
24 participate. If he submitted himself to
25 be a candidate, he was welcome to

1 S. WHITE

2 participate, fill out the form, comment.

3 He might well have been selected,

4 actually. You know, through the whole

5 process we had always, like, a person --

6 for example, the year that Peggy

7 Hatton was the candidate, it was --

8 Q. Oh, I'm sorry. She ran for more
9 than one year.

10 A. Okay. It was the first year
11 when she was the candidate when it was
12 Leonardo Vera and Emilia White.

13 Q. So 2009.

14 A. And there was another man who
15 was going to be a candidate. And the way
16 we worked it out was is that even if
17 you're not selected to be one of the
18 original slate, you're going to be --
19 which is what happened to me in 2008 --
20 you're going to be a backup.

21 So there was a woman -- what was
22 her name again? And she came to the
23 Gordons, and she met with us, and she was
24 absolutely adamant that she wasn't going
25 to participate in our process and was

1 S. WHITE

2 going to be on her own. And she felt that
3 she could succeed. And we said, "Well,
4 look, you know, please be part -- you can
5 be -- there's an election every year. You
6 can be part of it this year as support.
7 You will be considered as a backup in the
8 event that, you know, someone can't run.
9 And there's always next year. And we
10 would love -- and then you would have a
11 year of campaigning under your belt so
12 that you could be a great candidate, and,
13 you know, we would be happy to consider
14 you as just the same as everybody else."
15 And she did.

16 And then what happened was the
17 guy dropped out. And it would have been
18 her. She would have been on the list.
19 But she ended up being an opponent because
20 she just did not like to work with others.
21 And it was kind of sad because she was a
22 really nice lady and had good intentions
23 and it was a shame that she ended up
24 running against Peggy Hatton and I can't
25 remember her name. She was a PTA person,

1 S. WHITE

2 very nice lady.

3 (S. White Exhibit 18, Official
4 Election Results dated May 19, 2009,
5 was marked for identification, as of
6 this date.)

7 Q. So since we are talking about
8 the 2009 election in which Ms. Hatton ran,
9 I wanted to introduce Exhibit 18, which is
10 the official results from the 2009
11 election. And it looks like Peggy or
12 Margaret Hatton had two opponents:
13 Mr. Solomon and Ms. Watson.

14 Is Ms. Carolyn Watson to whom
15 you've been referring?

16 A. That's right. Yes.

17 Q. And so Ms. Watson did not
18 participate in what was at the time the
19 stakeholder slating process; is that
20 correct?

21 A. Correct. Well, she
22 participated, but then she opted out.

23 Q. Okay.

24 A. By participated, I mean she came
25 to a meeting. I remember if she came to

1 S. WHITE

2 one or two meetings and basically tried to
3 convince us -- tried to convince us that
4 we shouldn't have a process, that we
5 should be back to the old smoke-filled
6 backroom process.

7 Q. Do you recall if Ms. Watson --
8 never mind. So let's go back to
9 Exhibit 17.

10 Why wasn't Ms. Watson included
11 in your December 18, 2015 email? She's a
12 former candidate of the school board.

13 A. Well, she had opted not to be
14 participating in our process. That's the
15 same thing with Mr. Jones. It was --
16 it's -- if you opt out of the process,
17 then you've opted out.

18 Q. So it's a one-time opt-out?
19 It's not an annual opt-out? Is that
20 right?

21 A. No. I mean, each year, there's
22 an opportunity to present yourself as a
23 candidate, to be one of the candidates
24 who's part of the process. And then this
25 list of people are the list of

1 S. WHITE

2 ex-candidates who have been part of the
3 process. So he was always -- anyone is
4 always perfectly eligible and welcome to
5 respond to the questionnaire and to come
6 to the forum and to present themselves to
7 the public.

8 And then once you've gone
9 through that process and the public has
10 said, "I like you," and then you -- these
11 are the people who had experience being
12 part of our process inside of the
13 campaign. So Mr. -- Ms. Watson and
14 Mr. Jones didn't have that experience.
15 They had never been part of our process of
16 running a campaign and how to do all of
17 the things.

18 So the reason for putting this
19 group of people together is because they
20 had the institutional knowledge of how
21 things work. And it's a technical
22 process. Their role is not a -- it is not
23 really so much that of an arbiter.
24 They're not the plebiscite. They are the
25 technical experts who have had experience

1 S. WHITE

2 with the process before and can help to
3 guide the process to being successful.

4 Q. So the same reasons would have
5 precluded Mr. Juan Pablo Ramirez from
6 receiving your December 2015 email; is
7 that right?

8 A. Yeah. That's right. This
9 particular group of people is just the
10 people who have participated in our
11 campaigns. And that's a complicated
12 process. First of all, you have to put
13 together a platform together with other
14 people. You have to, like, have
15 disagreements and work through your
16 disagreements and then decide, okay, and
17 show that capability of working together
18 and then go out onto the campaign trail
19 and all the things you learned. And
20 that's why they are on this list, because
21 they've done that. So if you haven't done
22 that, then you wouldn't be on this list.

23 Q. And so only the persons on that
24 list are the ones who decide the slate for
25 that year.

1 S. WHITE

2 A. Yes. Well, they're not exactly
3 the decider. They're more of the filter.
4 It's very interesting, because I put it
5 together kind of as a way of preventing
6 possible -- a possible slate which didn't
7 have as good a chances of winning.
8 Because, you know, it's possible that you
9 might hold a forum one year, and everybody
10 who came to the forum, like, kind of
11 picked three candidates who were not going
12 to work well together. I was just
13 anticipating a possibility of that.

14 So I left it open. I didn't
15 make it, like, a kind of a democratic
16 election process which was final from the
17 public. I wanted to have that one last
18 step where people who were experts in the
19 technical details of running a campaign
20 would be able to make sure we put together
21 a slate that worked well.

22 But the interesting coincidence
23 of it was that they never ever had to
24 overrule the public. In each and every
25 situation, whenever the public rating

1 S. WHITE

2 system came out, it was always the top
3 three people that the public liked always
4 turned out to be the three people that the
5 group -- I call them the council of
6 elders -- would always be satisfied with
7 that and go forward with the top raters
8 from the public, which -- there was one
9 year where there was a tie between me and
10 Steve Price, very early on. I remember we
11 were having -- there was a big debate
12 going back and forth, you know.

13 Q. Do you remember what year?

14 A. That would have been 2010 was
15 the year that Steve Price ran, because it
16 turned out to be Steve Price. I was so
17 happy because I really didn't want to be
18 the candidate. And that was the year --
19 what was it? It was -- Price, Young
20 Mercer, and Luciano I think was the three
21 that year. Yeah. And the public was
22 tied. And it was the council of elders
23 that had to cast the tiebreaker. And even
24 that was tied right down to the last vote.
25 There was only one vote by one vote that I

1 S. WHITE

2 was so happy that it was Steve Price.

3 Q. Who was on the council of elders
4 that year?

5 A. In 2010? It would have still
6 been the Stakeholders organization at that
7 time. There hadn't yet been a number
8 of -- all of these people hadn't yet been
9 candidates. It was a much smaller group
10 of people who were candidates. And at
11 that time, you didn't have to be a
12 ex-candidate. It included people who had
13 been a part of the Stakeholders
14 organization before I ever got involved
15 who had been running campaigns since
16 before I ever even got involved, people
17 like Carole Anderson.

18 Q. So Carole Anderson is still on
19 your email at Exhibit 17; right?

20 A. Yeah. Well, she went on to
21 become a candidate one year.

22 Q. Oh, I see.

23 So when did you decide to limit
24 the -- what you called the council of
25 elders to former candidates?

1 S. WHITE

2 A. Well, I had to put it together
3 when the Stakeholders no longer existed.

4 Q. So approximately 2013?

5 A. Yeah, because 2012 was the year
6 Concerned Citizens came along. And then
7 2013, that was another one of the years I
8 don't have a good remembrance of exactly
9 how it was put together. But certainly
10 after 2013, Stakeholders was now history,
11 and we had to figure out how to have that
12 final -- how to that final process was
13 going to go.

14 Q. I want to hand you what's going
15 to be marked Exhibit 19.

16 (S. White Exhibit 19, An email
17 dated January 12, 2016, with
18 attachment, Bates SW-0000020987, was
19 marked for identification, as of this
20 date.)

21 Q. So Exhibit 19 is a
22 January 12, 2016, email from you to
23 poweroften@npogroups.org dated -- and if
24 you'll see Bullet 4, which begins on the
25 backside of the page, you say, "It's time

1 S. WHITE

2 to start thinking about the May school
3 board and budget vote."

4 And then if you go on, it looks
5 like you decided that Thursday,
6 January 28th, was going to be the date of
7 the public forum. And you go on to say,
8 "Our goal is to strengthen the unity in
9 our community and to provide the very best
10 support to a unified slate of candidates."

11 Do you see that?

12 A. Mm-hmm.

13 Q. Did you write that?

14 A. Yes.

15 Q. And then at the bottom of Bullet
16 4 it said, "Those who wish to run should
17 fill this Google form."

18 Do you see that?

19 A. Yes.

20 Q. And that's the Google form that
21 was attached to Exhibit 17?

22 A. 17. Let me see.

23 Q. It's on the backside.

24 A. No. That's not a Google form.
25 This is the printed material.

1 S. WHITE

2 Q. Did the Google form have the
3 same questions from the attachment to
4 Exhibit 17?

5 A. Yes.

6 (S. White Exhibit 20, An email
7 dated February 9, 2016, was marked for
8 identification, as of this date.)

9 Q. So Exhibit 20 is an email from
10 you. It's actually an email string
11 involving two emails from
12 steve@poweroften.us. The earliest is
13 dated February 4, 2016, and then the
14 subsequent email is dated
15 February 9, 2016.

16 The first sentence at the top of
17 Exhibit 20 says, "As promised, last night,
18 we invited all the former candidates from
19 years past to gather and to consider how
20 to put together an effective slate of
21 candidates for this year. They considered
22 the opinions given by people who attended
23 the forum (there were unfortunately not
24 very many) and the questionnaire answers
25 that you all provided. We are happy to

1 S. WHITE

2 report that we have formed the mothers of
3 education, four women who represent
4 diverse backgrounds and skills and have
5 each a personal stake in the district.
6 They are Jean Fields, Kim Foskew, Sabrina
7 Charles-Pierre, and Natasha Morales."
8 And then in my recitation, I left out the
9 parentheticals that are in Exhibit 20.

10 So my question is do you
11 remember who attended the forum referenced
12 in the second sentence?

13 A. I don't remember who attended
14 the forum, no.

15 Q. Do you remember who filled out
16 the candidate questionnaire for the 2016
17 election?

18 A. That would be everybody who this
19 email is sent to.

20 Q. Why do you say that?

21 A. Well, it's an email to tell
22 people -- it's an email that tells the
23 people who had -- who had agreed that they
24 would be willing to be school board
25 candidates the results of the selection

1 S. WHITE

2 process.

3 Q. If you go down towards the
4 bottom of the same email, it says,
5 "Special thanks are due to all of you who
6 are willing to serve on this most
7 difficult board."

8 What did you mean by that?

9 A. I'm not seeing that. Where is
10 it?

11 Q. It's right above your signature.

12 A. Oh, I see. Not at the bottom of
13 the whole thing. At the bottom of that
14 one particular paragraph there. I see it.
15 Yes.

16 Q. What did you mean by that?

17 A. Well, I'm being appreciative of
18 people who are willing to volunteer their
19 time to be on the East Ramapo School
20 Board.

21 Q. What did you mean specifically
22 by "willing to serve on this most
23 difficult board"?

24 A. So being a member of the East
25 Ramapo School Board is not an easy thing.

1 S. WHITE

2 Meetings routinely run into the wee hours
3 of the morning. There is a lot of
4 contentious issues that come up. Two
5 school board members resigned from the
6 positions and wrote letters that were
7 published about the terrible difficulties
8 they had as school board members and had
9 to redesign because they felt decisions
10 were being taken in their name without
11 their consultation. That was Suzanne
12 Young Mercer and Steven Price.

13 And so almost everything about
14 East Ramapo has become very difficult. We
15 just recently had our district clerk
16 resign, and the person who was hired to
17 replace her resigned after one week. And
18 the district clerk told me when she goes
19 to the clerk conventions, she has sympathy
20 from everyone for her most difficult clerk
21 position.

22 So almost everything -- the
23 teachers in East Ramapo face the
24 difficulty of not knowing if they are
25 going to have a job next year because of

1 S. WHITE

2 all the slews of layoffs. So almost
3 everything is difficult.

4 Q. So can you tell me the race of
5 the people who you sent this
6 February 9, 2016, email to?

7 A. I think so. Yeah. D. Sachs'
8 name is not there, but I believe that's
9 David Sachs. I believe he's White. David
10 Curry is White. Natasha is Latina. Tim
11 Scott is African American. Hamadi Martin,
12 African American. Sabrina Charles-Pierre,
13 African American. Kim Foskew is White.
14 Ed Joseph, African American.

15 (S. White Exhibit 21, A
16 compilation of candidate
17 questionnaires, Bates SW-0000052536,
18 was marked for identification, as of
19 this date.)

20 Q. So Exhibit 21 is a compilation
21 of what appears to be your candidate
22 questionnaires; is that right?

23 A. Yeah. These appear to be answer
24 for the candidate questionnaires. Yes.

25 Q. And this appears to be for 2016;

1 S. WHITE

2 right?

3 A. Yes.

4 Q. So can you bring out Exhibit 16.

5 A. Excuse me. Can I take a
6 bathroom break?

7 Q. Yes.

8 (Recess)

9 BY MS. KOLLM:

10 Q. So Power of Ten endorsed the
11 2016 public school candidates; right?

12 A. Correct.

13 (S. White Exhibit 22, A Power of
14 Ten newsletter dated May 24, 2016, was
15 marked for identification, as of this
16 date.)

17 Q. So if you look at -- so
18 Exhibit 22 is the May 24, 2016, Power of
19 Ten newsletter. And if you look at the
20 page that in the bottom right says 4 of 8.

21 A. Yes.

22 Q. It says, "Message from our
23 candidates."

24 And those are the public school
25 candidates for 2016?

1 S. WHITE

2 certainly, there isn't a lot of what you
3 would call general campaigning activity
4 going on.

5 Q. Okay.

6 (S. White Exhibit 23, Official
7 Election Results dated May 16, 2017,
8 was marked for identification, as of
9 this date.)

10 Q. So Exhibit 23 are the additional
11 results for the 2017 school board
12 election.

13 Can you tell me who the public
14 school candidates were in 2017 who Power
15 of Ten endorsed?

16 A. Manigo, Goodwin, and Dos Reis.

17 Q. And those three individuals are
18 also plaintiffs in this litigation; is
19 that right?

20 A. I'm not 100 percent sure who's
21 plaintiffs and who's not.

22 Q. Do you know how many candidates
23 filled out the candidate questionnaire
24 linked on Power of Ten in 2017?

25 MS. BARBIERI: Objection.

1 S. WHITE

2 something about it?

3 Q. That makes sense.

4 But you never solicited
5 Mr. Charles or Mr. Germain; right?

6 A. No.

7 (S. White Exhibit 26, Official
8 Election Results dated May 15, 2018,
9 was marked for identification, as of
10 this date.)

11 Q. So do you have Exhibit 26 in
12 front of you?

13 A. Exhibit 26. Yes.

14 Q. And Exhibit 26 is the results
15 for the May 2018 school board election.

16 Can you tell me who the public
17 school candidates endorsed by Power of Ten
18 were in this election.

19 A. Sabrina, Miriam, and Joselito.

20 (S. White Exhibit 27, An email
21 dated February 4, 2018, Bates
22 SW-0000023941, was marked for
23 identification, as of this date.)

24 Q. Exhibit 27 is an email from you
25 to you. It says, "Thank you." And it

1 S. WHITE

2 says, "Thank you for responding to the
3 school board candidates questionnaire."
4 And it's dated February 4, 2018.

5 So my question is do you
6 remember who filled out the 2018 school
7 board candidate questionnaire?

8 A. There were a number of people.
9 Do we have any -- no. I think what
10 happened was I blind copied, so I don't
11 have the list here on this email. I don't
12 remember everyone. No.

13 Q. Do you remember anyone?

14 A. 2018? Who was at the forum?
15 Now let me try to remember.

16 Q. Were the candidates who became
17 the public school slate part of the forum
18 in 2018?

19 A. Yes.

20 Q. Do you recall if the candidates
21 who formed the public school slate in 2018
22 filled out your 2018 candidate
23 questionnaire?

24 A. They did.

25 Q. Is there anyone else who you can

1 S. WHITE

2 remember filled out the 2018 candidate
3 questionnaire or participated in the 2018
4 forum?

5 A. There were. There were others.
6 Because I remember we had to have the
7 conversation. We had to tally it up, and
8 then we had to have the conversation like
9 we did every other year. Maybe I'm just
10 getting tired. This is just last year
11 now, and I can't remember who was there.
12 Was it -- Vince Sykes was one of them, I
13 think? Was he the year before? No. I
14 think he was -- maybe he was last year.
15 Vince Sykes. And then -- wow. There
16 were -- there were, I would say, five or
17 six at least.

18 Q. If you remember, just please let
19 me know.

20 Did you limit the 2018 slating
21 process to former candidates like you had
22 previous years?

23 A. We did --

24 MS. BARBIERI: I'm sorry. Could
25 I have that question read back.

1 S. WHITE

2 (The requested portion of the
3 record was read.)

4 A. So I assume you're asking about
5 the -- what I call the council of elders.

6 Q. Yes. The council of elders.

7 A. Yes. I sent an email to those
8 who had previously been candidates, asking
9 them to participate in the process of
10 finalizing the slate.

11 Q. So have you already endorsed the
12 slate for the 2019 school board election?

13 A. We have not.

14 Q. Is it fair to say that you've
15 been involved with the slating process for
16 the public school slate of school board
17 candidates in every election from 2013
18 onward?

19 A. Yes.

20 Q. Okay. Let's take a break.

21 (Recess)

22 (S. White Exhibit 28, A letter
23 dated August 16, 2017, Bates
24 PL0072412, was marked for
25 identification, as of this date.)

I N D E X

WITNESS	EXAMINATION BY	PAGE
STEVEN WHITE		

E X H I B I T S

S. WHITE	DESCRIPTION	PAGE
Exhibit 1	An email dated December 28, 2016, with attachment, Bates SW-0000045534	8
Exhibit 2	An email dated August 18, 2012, with attachment, Bates SW-0000013033	63
Exhibit 3	An email dated February 14, 2013, with attachment, Bates SW-0000014375	106
Exhibit 4	Official Election Results dated May 20, 2008	121
Exhibit 5	An email dated October 14, 2014, with attachment, Bates SW-0000044187	124
Exhibit 6	An email dated October 8, 2012, with attachment, Bates SW-0000013216	130

I N D E X (Cont'd)

E X H I B I T S

S. WHITE	DESCRIPTION	PAGE
Exhibit 7	Official School Board Election Results dated May 21, 2013	143
Exhibit 8	An email dated February 23, 2015, with attachment, Bates SW-0000044478	147
Exhibit 9	An email dated March 11, 2013, with attachment, Bates PL0023470	150
Exhibit 10	Power of Ten website printout	160
Exhibit 11	Official Election Results dated May 15, 2012, Bates PL0070467	165
Exhibit 12	Official Election Results dated May 20, 2014	165
Exhibit 13	An email chain dated February 25, 2014, Bates SW-0000017556	170
Exhibit 14	An email chain dated January 4, 2015, Bates SW-0000018885	173
Exhibit 15	Official Election Results dated May 15, 2015	182

I N D E X (Cont'd)

E X H I B I T S

S. WHITE	DESCRIPTION	PAGE
Exhibit 16	Official Election Results dated May 17, 2016	196
Exhibit 17	An email dated December 18, 2015, with a questionnaire, Bates EW-0000019847	197
Exhibit 18	Official Election Results dated May 19, 2009	205
Exhibit 19	An email dated January 12, 2016, with attachment, Bates SW-0000020987	212
Exhibit 20	An email dated February 9, 2016	214
Exhibit 21	A compilation of candidate questionnaires, Bates SW-0000052536	218
Exhibit 22	A Power of Ten newsletter dated May 24, 2016	219
Exhibit 23	Official Election Results dated May 16, 2017	245
Exhibit 24	An email dated February 13, 2017, with attachments, Bates SW-0000045602	247

I N D E X (Cont'd)

E X H I B I T S

	S. WHITE	DESCRIPTION	PAGE
1	Exhibit 25	An email dated	249
2		February 10, 2017,	
3		Bates SW-0000019457	
4	Exhibit 26	Official Election	252
5		Results dated	
6		May 15, 2018	
7	Exhibit 27	An email dated	252
8		February 4, 2018,	
9		Bates SW-0000023941	
10	Exhibit 28	A letter dated	255
11		August 16, 2017,	
12		Bates PL0072412	
13	Exhibit 29	An email dated	287
14		June 17, 2012,	
15		with attachment,	
16		Bates SW-0000012811	
17	Exhibit 30	An email dated	290
18		January 11, 2013,	
19		with attachment,	
20		Bates SW-0000000112	
21	Exhibit 31	An email dated	291
22		January 19, 2013,	
23		with attachment,	
24		Bates SW-0000014070	
25	Exhibit 32	An email dated	298
		January 22, 2013,	
		with attachment,	
		Bates SW-0000014081	

I N D E X (Cont'd)

E X H I B I T S

S. WHITE	DESCRIPTION	PAGE
Exhibit 33	An email dated May 15, 2016, with attachment, Bates SW-0000045461	300
Exhibit 34	An email dated January 15, 2013, Bates SW-0000013578	317
Exhibit 35	An email dated August 7, 2012, Bates SW-0000012992	317
Exhibit 36	An email chain dated August 9, 2012, Bates SW-0000012997	319
Exhibit 37	An email dated September 15, 2013, Bates SW-0000035092	320
Exhibit 38	An email dated December 25, 2014, Bates SW-0000025665	321

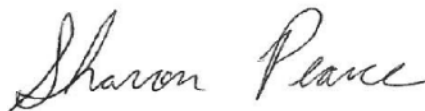
CERTIFICATION

I, SHARON PEARCE, a Notary Public for
and within the State of New York, do
hereby certify:

That the witness whose testimony as
herein set forth, was duly sworn by me;
and that the within transcript is a true
record of the testimony given by said
witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I am
in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 26th day of February,
2019.



SHARON PEARCE, RMR, CRR

* * *